



GPA Midstream Meeting with EPA in RTP on NSPS OOOOa Agenda

January 17, 2018

Core Issues:

1. Definition of Well Site
2. Unscheduled or Emergency Vent Blowdowns
3. Quarterly Compressor Station LDAR Requirements
4. Monitoring Plan Requirements
5. Recordkeeping Requirements
6. Definition of Compressor
7. Capital Expenditure Definition

Additional Issues:

1. "Once In, Always In" for Compressor Station LDAR
2. "Including but not limited to" in Fugitive Definitions
3. Remove Compressor from Fugitive Emission Components Definitions
4. Low Temp Exemption for LDAR
5. Extend to Initial Monitoring Event to 180 days
6. Consistent Threshold for Monitoring Device
7. OOOOa Table 3 Amendment
8. Extend Repair Deadline to 60 days
9. Tank VRU Operations

Technical Corrections:

1. Inconsistent Resurvey Requirements
2. Notification Requirements in 40 CFR 60.15(d)
3. 95% Emission Reduction on Average Basis
4. Revisions to Allow Operators to do Annual Calculations for Tanks Under 4TPY
5. Clarify of 60.487a:
6. Add Cross Referencing to 60.5340a(c)(14)
7. Revise Definition of Certifying Official
8. Revise 60.5410a (c)(1)

